# Fish Friendly Farming Environmental Certification Program

**Laurel Marcus** 

# **Initial Selection Panel Review**

0043

Fish Friendly Farming Environmental Certification Program

California Land Stewardship Institute

Applicant amount requested: \$1,000,243

Fund This Amount: \$1,000,243

The proposal outlines a very strong approach, and this appears to be a good project. The applicant has been successful in involving landowners.

The selection panel recommendation is to fund with conditions with the dollar amount, but not to exceed the requested amount, as appropriate, based on the suggested changes outlined below.

The main drawback of this proposal is that it needs a stronger emphasis on, and greater detail in its monitoring and economic analysis. The applicant should provide information on the qualifications and experience of people involved in the monitoring plan and economic analysis (i.e. provide CVs of people performing the work). The applicant also needs to clarify criteria used for the selection of restoration components. The applicant also needs to clarify criteria for cost sharing creek restoration and erosion control projects. Establishing criteria for high priority areas, key resource concerns, and access as demonstration site should help maximize environmental benefits from cost-sharing.

Fund

# **Technical Panel Review**

**Proposal Name:** Fish Friendly Farming Environmental Certification Program

Applicant Organization: California Land Stewardship Institute

**Amount Requested:** \$1,000,243

Panel Rating:

Good - Quality but some deficiencies

### **Panel Summary**

The Panel found the approach in this proposal to be very attractive, specifically noting the strength of the proposed certification process and the level of landowner involvement and implementation experience. However, the panel noted several deficiencies of the proposal. Specifically, the panel found the monitoring component to be weak, and raised concerns that the monitoring and economic aspects of the project were not well developed and represented only five percent of the budget. Further, the applicant does not seem qualified to implement the adaptive management aspects of the project.

The deficiencies in the monitoring program must be addressed. The Panel recommended that the applicant prepare a new proposal that uses a scientific approach to monitoring the effectiveness of practices implemented - one that uses experimental controls and replication, but retains the same level of interaction with farmers. Evaluation of the performance of on-farm sediment retention is critically important and the Panel recommends the involvement of a hydrologist or geomorphologist specializing in erosion and fluvial sediment transport. Given the number of sites available, on-farm monitoring of soil loss and movement of noxious weeds appears to be feasible as well.

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**Amount Requested:** \$1,000,243

#### Goals

# Rating good

Comments Overall ecosystem and agricultural goals are identified and are well aligned with the Ecosystem Restoration Program goals. The strength of the proposal is the integration of agricultural activities with ecosystem restoration, for which the Fish Friendly Farming program appears to have a solid record of success.

> The proposal provides a concise and informative statement of the problem. Unfortunately one of the major weakness of the proposal is that the authors do not provide a justification for how or why they chose to investigate only the issue of fine sediment when a limiting factors analysis for the basin of interest (Napa River) identified low summer flows, high water temperatures, and altered stream channel structure as limiting salmonid productivity (in addition to fine sediment effects). It is understandable that the authors choose to focus their efforts on a single issue; however, it is not clear how this issue was selected or what the ecological consequences will be. It is often assumed that if an impact is identified and the stressor is relieved, that fish productivity will increase. However, if other factors create a stronger limit on productivity, then relieving the targeted stressor will not achieve the desired result.

It is also intriguing that the authors defined a goal of reducing invasive non-native plants in riparian areas when the problem statement has no mention of this issue.

The project's objectives are clearly stated; however, they are not directly linked to the specific tasks outlined in the body of the proposal. Measures of success are also vague or absent in many cases.

# **Justification And Conceptual Model**

Rating	fair
	Discussion of the conceptual framework is sparse and limited to an overly busy flow chart and a few general statements. No testable hypotheses are proposed and the limited monitoring effort is unlikely to provide a learning opportunity for what actions result in successful outcomes. A standard workbook and template have already been developed but the ideas are not being tested and thoroughly evaluated. It appears that the authors are working under the assumption that the restoration actions and BMPs that they are prescribing will have beneficial results without direct testing.

# **Approach**

Comments The proposal includes a lengthy discussion into the background and overall approach of the Fish Friendly Farming program. The Napa River system has a great deal of information available that could assist the program in developing successful restoration strategies (e.g., limiting factors analysis by Stillwater Sciences). The proposal also identifies and targets specific tributaries that provide critical habitat for steelhead. Unfortunately the limited monitoring effort and lack of	Rating	good
		The proposal includes a lengthy discussion into the background and overall approach of the Fish Friendly Farming program. The Napa River system has a great deal of information available that could assist the program in developing successful restoration strategies (e.g., limiting factors analysis by Stillwater Sciences). The proposal also identifies and targets specific tributaries that provide critical habitat for steelhead. Unfortunately

result in adding very little to the knowledge base. For example, 'performance measures' that simply summarize the number of road miles assessed or creek distance evaluated will not inform broader ecosystem restoration efforts. Some measures of the project's outcome are also necessary. The 'effectiveness monitoring plan' proposed by the authors for evaluating project designs has not been developed and is a major downfall of the proposal.

# **Feasibility**

Rating	good
Comments	The project's approach is technically feasible and is likely to be successful in outreach, certification of Fish Friendly Farming, and providing technical support to landowners (the strength of the proposal and overall approach). As stated above, the project's weakness is in the evaluation of restoration projects and a poorly designed monitoring effort. Environmental compliance, permitting, and other constraints were adequately addressed.

#### **Performance Evalutation**

Rating	poor
	The strength of the approach is the integration of farmers, farming practices, and water quality improvement measurements in a non-regulatory framework. This component of the study is well developed, has a proven track record, and has adequate performance measures.
	The major limitation of the proposal is the lack of a clearly articulated monitoring plan. No criteria for evaluating the outcome of restoration projects have been identified and no adaptive management strategy has been developed. Without testable hypotheses and thorough evaluation of restoration actions it is

unlikely that important insights will be gained or the success of restoration actions understood. Merely stating that 'estimates of sediment load reduction' will be made is not sufficient. The authors should provide some indication of how this task will be accomplished, as it is not simple. Also, the monitoring plan itself should not be the deliverable. Instead, the implementation of a well designed plan, including data collection, analysis, and dissemination, should have been articulated.

#### **Proposed Outcomes**

# Rating fair

Products of value that are likely to be generated include landowner interaction through outreach, educational workshops, and certification. This approach is well-reasoned and can be applied to other crops and ecosystems.

The program is heavy on project design but sparse on evaluation and testing of ideas. Many cookie-cutter approaches to stream restoration such as checklists of features, designs based on bankfull channel width (a Comments parameter that is highly variable in natural systems and the controls of which are poorly understood), and the assumption that beneficial management practices result in desired outcomes have been doomed to failure in the past. There is no indication that the program can learn what strategies are successful and in what context that success applies. Thus, there is no way to determine if the ecosystem restoration goals were met.

> There is no indication of what types of data will be collected, nor how it will be stored or made available.

# **Capabilities**

Rating		
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The core members of the project team have a proven track record for working successfully with landowners. One notable exception on the team is the lack of an economist to work on the objective of developing an economic model (task 12).

Comments

The success of previous restoration projects is not known and a large portion of the design and implementation of activities identified in the proposal will be sub-contracted to individuals with

unknown levels of expertise.

#### **Cost-Benefits**

Rating	fair
	The majority of the budget goes to salary for the core team and contract work for project design and implementation. The requested amount appears to be sufficient for most tasks. Far too little is allocated for monitoring and evaluation (2% of total budget request). Deliverables are modest.
	The program has a proven track record of acquiring matching funds and grants.
	Staff salary seems overly generous given the level of expertise and non-profit status (e.g., ~\$100k annually for individuals with a bachelor's degree when Ph.D. level scientists in academia or agency positions make substantially less).

# **Overall Evaluation Summary Rating**

Rating	good
Comments	The overall approach of the Fish Friendly Farming program is well developed and has a good track record of success for working with agricultural landowners. The major weakness is the lack of evaluation and testing of restoration designs. The proposal is also poorly written and relies too much on overly

generalized information describing the program's background and provides too little specific information. The authors also need to make specific linkages between stated objectives and the tasks identified in the scope of work.

The program has a great deal of potential and many of the limitations of this proposal can be overcome. This reviewer strongly encourages the authors to develop a thorough plan for evaluating and testing their restoration actions, articulate missing or unclear aspects of the proposal, and resubmit for further consideration.

**Proposal Number:** 0043

**Proposal Name:** Fish Friendly Farming Environmental Certification Program

Applicant Organization: California Land Stewardship Institute

benefit MSCS-covered species.

**Amount Requested:** \$1,000,243

#### Goals

# Rating very good Comments The Fish Friendly Farming (FFF) Environmental Certification Program is an existing program that the applicant is seeking to extend with additional funding. Overall I would classify it as a project that develops and implements agricultural activities that

The proposal does an excellent job identifying ecosystem and agricultural goals and linking them to ERP goals. I was clear on the project objectives but was concerned by the specific manner in which they are stated. In the more general goal/objectives section (page 3) the proposal twice indicates that 7-10,000 acres will be enrolled in the new program. Later however in the more detailed discussion of tasks (page 12) the proposal states that "Up to 75 Farm Conservation Plans will be completed covering up to 7-10,000 acres". These are not the same and may be a cause for concern for the ERP.

Similarly the Goals discussion of what is going to be done with monitoring (Goal 4, page 4) and economic analysis (Goal 5, page 4) are more impressive than what they actually commit to doing in these areas (Tasks 11 and 12, page 16).

The objectives are tangible and measurable and the plan to assist farmers in integrating agricultural activities with ecosystem activities is presented in a clear fashion.

# **Justification And Conceptual Model**

Rating	very good
Comments	I am not sure that this is ever stated, but the proposal is presented as a full-scale implementation project. As stated above, they have a clear grasp of the majority of technical aspects of the project. They provide an excellent justification for using an incentives-based approach to these issues. I didn't see much hypothesis testing as they indicate that their manual already brings together the appropriate BMPs and the personnel they will bring together know how to complete tasks 1 through 10. Tasks 11 (effectiveness monitoring) and 12 (economic model) have the potential for providing the most useful new information. The project, however, will only devote sufficient resources to collect the data necessary to formulate a monitoring plan (task 11) and the data on economic benefits and costs necessary to parameterize an economic model necessary sufficient. The deliverables are one step short of something that could be used to test hypotheses.
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# **Approach**

Rating	very good
Comments	Overall the approach is excellent. They have an impressive understanding of the the full cast of players who need to be brought together. I judge the approach as very appropriate. The additional acreage will provide more ecological data and more insights on the ecology/agricultural interactions but it is difficult for me to assess the marginal benefits of this additional data above what they already know from
	their past work. They seem committed to sharing their

insights with their diverse partners so I view that outreach of results as a strength.

Once again questions arise as to why they have not committed more effort to filling in gaps on the monitoring and economic analysis sides. At the end of the project those gaps will remain.

# **Feasibility**

Rating	excellent
	Based on their prior experience, they seem to be on top of these issues. As mentioned above they over-qualify what they will actually produce (which may be a matter of concern) but they have done all of the implementation steps (with the exception of monitoring plan and economics) before and seem quite competent. They very thoroughly address all of the regulatory issues and have a good grasp of operational and natural concitions.

#### **Performance Evalutation**

Rating	good
Comments	The CLSI has substantial experience in working on identical types of interventions. Page 17 of the proposal provides a list of eleven performance measures that they will evaluate each year. The first nine are straightforward and appropriate. These are mostly input and activity type measures (acres enrolled, miles assessed, acres restored).  The last two (sediment load reduction and cost information are more complex and it is not clear how far the project will actually
	get in providing information on these two topics. A close reading of the proposal indicates that they will set up a plan for

monitoring sediment reduction but page 16 seems to commit to only formulating the plan while page 17 indicates that the actual volume of sediment will be estimated. Similarly on the cost side the page 16 discussion discusses setting up the model and collecting the needed data while page 17 states that cost information will be reported. I am not convinced that they have committed to providing a report on cost data that would be understandable/of use to someone (anyone).

# **Proposed Outcomes**

Rating	very good
	Based on the CLSI track record, the proposed project has a high likelihood of contributing to ecosystem health and be of use to agencies and farmers who manage similar ecosystems. Based on the commitments made and the resources devoted, the proposal will not greatly increase the knowledge base relating the integration of agricultural systems to ecosystem restoration with respect to some of the key monitoring aspects and the economic costs and benefits at the farm level.
	The CLSI seems to have a good track record of producing reports on the basic ecosystem measures. Their abilities to develop and implement a monitoring plan and a useful economic model are less certain.

# **Capabilities**

Rating	very good
Comment	Their capabilities for the basic implementation tasks
	are excellent. They appear to have the infrastructure and relationships needed to carry out these tasks.

Their abilities to do some of the things they have not previously done in other projects (monitoring plan and economic model) are less certain.

#### **Cost-Benefits**

Rating	good
	I am not well qualified to judge the cost-benefit comparison. Is \$1 million dollars for placing 7-10,000 acres (if they actually get that many acres see comments above) in the FFF program high or low? I don't have a base for comparison.
Comments	
	They have put few resources in Tasks 11 and 12 (about
	3%) and have promised only intermediate outputs from
	those tasks so it is unclear what benefits can be
	attributed to this project. Without subsequent
	funding, these tasks may never be completed.

# **Overall Evaluation Summary Rating**

Rating	very good
	Overall it is difficult for me to evaluate and accurately rate the proposal. Most of it focuses on technical restoration issues that are beyond my competence. My not very well-informed rating of those project components is high. the CLSI seems well organized and productive. The majority of the proposal demonstrates competence
	The two task of more interest to me, Tasks 11 and 12, as a whole receive only 3% of the total budget much of this in payments to as yet unidentified contractors. It is unclear how much new knowledge will come out of this part off the project. I would have rated the project even higher if these project components received more funding and if CLSI promised more finished outputs from Tasks 11

and 12.

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Applicant Organization: California Land Stewardship Institute

**Amount Requested:** \$1,000,243

#### Goals

Rating	fair
Comments	A clear statement of need or problem statement is lacking. While ample information is provided, it is not explicitly clear why this research is needed, and what program/policy needs it meets.  Goals and objectives are clearly defined. However the
	for the goals and objectives would help determine the feasibility of these stages given the time period.

# **Justification And Conceptual Model**

Rating	good
Comments	A relatively clear conceptual model is presented. The

# **Approach**

Rating	fair
Comments	

As with the goals/objectives efforts to explicitly explain how various steps would contribute to the desired outcomes would help. Also, as with the goals and objectives, the number of tasks and activities appear optimistic. A more clearly defined overview of how these various tasks fit together would help the reader.

# **Feasibility**

Rating	good
	Technically feasible, but I am uncertain as to how feasible the project is based on the lack of
	detail presented in earlier sections.

## **Performance Evalutation**

Rating	fair
Comments	Limited information is given on performance measures. The section that does discuss this lacks detail and a clear discussion of how performance measure will be used to shape program/policy.

## **Proposed Outcomes**

Rating	fair
	The proposed outcomes are questionable. Those presented in sections 7-9 are limited and lack any
	detail or rationale for their use.

# **Capabilities**

Rating	very good
Comments	The project team would appear capable of carrying out this project. Their background, experience, and qualifications are sufficient.

# **Cost-Benefits**

Rating	good
Comments	Since much of the proposal lacks clearly defined methods for meeting goals/objectives the suitability of the budget and cost sharing is uncertain. It remains uncertain if the goals and objectives can be met in the time period presented, so it is therefore difficult to determine the cost/benefit of the project. Based on the available information, it would appear that the requested resources are adequate to meet the first half of the study, and possibly the entire project.

# **Overall Evaluation Summary Rating**

Rating	good
Comments	Overall this project represents and important and timely effort. To better assess and determine water management options, a variety of quantitative data is needed. However, this proposal lacks the detail and specificity needed to adequately assess whether the methods would achieve their goals. A greater description of the specific data, variables, and measures, as well as pre/post test monitoring are needed.

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1. Applicability to ERP goals and regional priorities.

This proposal works toward meeting at least four of the six ERP strategic goals. The proposal would improve water quality by reducing sediment loads into the Napa River watershed; improve riparian habitats to support native and threatened salmonids; and rehabilitate ecological processes by restoring tributary channels and/or floodplain. As described, the inspection &maintenance component of individual implemented projects should provide long-term water quality and ecological benefits.

The proposal meets at least two milestones in the MSCS for impacts to salmonids from sedimentation. The proposal directly benefits MSCS-covered species by developing and implementing fish-friendly agricultural BMPs. It will also contribute to an economic and environmental cost-benefit analysis of agricultural practices that also benefit fish species.

notes:

2. Links with other restoration actions.

The proposal expands upon current activities undertaken by the applicant within the Napa River watershed, as well as restoration activities by other entities throughout the watershed.

If estimated sediment load reductions and acres of restored habitat are quantified through monitoring, then the project could definitely be used for future restoration actions in the area. If an economic analysis is performed using data collected from this effort (as anticipated), the information could provide an incentive for land owner participation in the future.

notes:

This proposal builds on a concept that is already popular in the Napa Watershed. However, it is not entirely clear how the proposed activities relate to any existing watershed plans. The economic model portion of the proposal is considered valuable.

#### 3. Local circumstances.

Participation by land owners in this project has been shown to be feasible in this and other watersheds draining to North San Francisco Bay. The proposal is appropriate to the Napa River watershed given the large percentage of privately-owned agricultural land in the watershed. There are no apparent constraints to implementing the proposal since the applicant has already worked with land owners to complete individual Farm Plans in this watershed, and due to existing partnerships with local agencies, e.g., Napa RCD and Napa County.

notes:

The proposal does not explain how stakeholder commitment will be evaluated or conveyed. It appears that some aspects of performance will be self-evaluated. This may be at odds with the desired transparency and accessibility of data from CALFED-funded programs.

#### 4. Local involvement.

There is broad stakeholder support from regulatory and resources agencies, as well as local land owners. Public outreach activities include printed and electronic materials; PSP applicant participation in local agricultural organizations; and multiple workshops and field trips. Though not stated in the proposal, these outreach tools can be used to share and demonstrate the rsults and success of the specific implemented projects proposed in this application.

notes:

Fish Friendly Farming certification is extremely popular in the Napa River basin. There is a great deal of stakeholder enthusiasm. FFF demand currently outstrips the capabilities of participating agencies to supply this type of certification.

#### 5. Local value.

This proposal does not clearly describe whether a watershed plan has been adopted for the entire basin, which would describe important habitats and stream reaches, and ideally identify priority areas for action. The proposal does identify significant studies that have characterized the sedimentation problems and sources that this proposal will help to remedy. Thus, it is unclear as to how much ecosystem restoration in the Napa River watershed will be achieved through this proposal. [The proposal cites that the Fish Friendly Farming program has 14,000 acres in the Napa River watershed already enrolled, but does not indicate what percentage this is of the total number of acres of agriculture in the watershed.] While some habitat and reaches of various tributaries will be improved through this proposal, it is not clear if there are contiguous habitats at risk that will not benefit from this project.

In a water quality context, this proposal will tackle some key sources of sediment pollution, resulting in a reduction in load, and assist in signficant implementation activities toward an adopted TMDL. The proposal provides incentive for local stakeholders to consider agricultural activities that will protect habitat or improve degraded areas.

notes:

The proposal addresses both agricultural and non-agricultural sources of sediment. The proposed activities have a large potential to improve water quality and involve local landowners in restoration activities.

6. Applicant history.

Yes.

notes:

The team that created the proposal is well regarded by members of the review panel and their colleagues. However, direct evidence of past successes is not clearcut or available to the panel.

7. Summary of Overall Panel Discussion and Review

This proposal describes a project that has the potential to significantly advance ERP goals in the Napa watershed. However, there are several outstanding questions. Concerns include the longevity of the certification process, questions about the "mini grant" element of the proposal, and the feasibility of the self-evaluation process by landowners. Some vital information was felt to be left out (second reviewer).

Stronger aspects of the proposal include a high degree of stakeholder enthusiasm for this type of project and the potential for stimulating more interest in the future. Furthermore, the proposed project addresses both agricultural and non-agricultural sources of sediment into tributaries of the Napa River. The proposal also includes significant cost-sharing (nearly 50%).

#### 8. Panel Quality Ranking

Very Good notes:

#### 9. Regional Priority Ranking

Very High notes:

# **Environmental Compliance Review**

Proposal Number: 0043

**Proposal Name:** Fish Friendly Farming Environmental Certification Program

Applicant Organization: California Land Stewardship Institute

1. Is compliance with California Environmental Quality Act (CEQA) required for this project?

Yes.

- 2. Is compliance with National Environmental Policy Act (NEPA) required for this project?
- 3. Does this project qualify for an Exemption or Exclusion under CEQA and NEPA, respectively?

Yes.

Comments

Each project in this program may require a different form of compliance. The applicant is well aware of this and states each project will have the pertinent documents completed.

4. Did the applicant correctly identify if CEQA/NEPA compliance was required? **Yes.** 

Comments

See comment #3

5. Did the applicant correctly identify the correct CEQA/NEPA document required for the project?

Yes.

Comments:

I suggest the applicant look into issuing a Programmatic document for this program to streamline the process.

#### **Environmental Compliance Review**

- 6. Has the CEQA/NEPA document been completed? **No.**
- 7. If the document has not been completed, did the applicant allot enough time to complete the document before the project start date?

  Yes.
- 8. If the document has not been completed, did the applicant allot enough funds to complete it?

Yes.

9. Did the applicant adequately identify other legal or regulatory compliance issues (Incidental Take permits, Scientific Collecting permits, etc.) that may affect the project? **Yes.** 

#### Comments:

The applicant discusses only salmonids. Delta smelt are also found in the Napa River. Although this program may have the potential to benefit delta smelt, DFG and USFWS should be consulted.

Identify those additional permits that may be needed by this project:

#### Need to be determined depending on which plans are certified

10. Does the proposal include written permission from the owners of any private property on which project activities are proposed or, if specific locations for project activities are not yet determined, is it likely that permission for access can be obtained?

Yes.

#### Comments:

Property owners volunteer to be in the program and as such will provide access.

11. Do any of these issues affect the project's feasibility due to significant deficiencies in planning and/or budgeting for legal and regulatory compliance or access to property?

No.

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1. Does the proposal include a detailed budget for each year of the requested support?

#### Yes.

2. Does the Budget Form include a detailed budget for each task identified on the Task and Deliverables Form and in the proposal text?

#### Yes.

3. Are the costs associated with each task and deliverable reasonable costs for performing the services?

#### Yes.

If no, please explain:

The costs appear to be reasonable, however need to review detailed budget for subcontractors to further evaluate reasonable costs.

4. Is each person (employee, consultant, subcontractor, etc.) identified on the Personnel Form also included on the Budget Form?

#### Yes.

5. Are there estimated hours and an associated hourly rate of compensation for each person identified on the Personnel, Tasks and Deliverables, and Budget forms?

#### Yes.

6. Does the budget include the benefit rate for all personnel identified on the Personnel and Budget forms?

#### Yes.

7. Are the proposed labor rates comparable to state rates?

#### Yes.

If no, please explain:

Labor rates appear to be reasonable. However employee job title and classification would be necessary to confirm.

8. Is more than 25% of the work proposed to be performed by subcontractors?

#### Yes.

If yes, what is the exact percentage to be performed by subcontractors?

66% of the task will be completed by the subcontractors. Recommend receiving detailed budgets for each subcontractor to determine if labor rates are reasonable and comparable to market rates.

9. Are project management expenses appropriately budgeted?

#### No.

If no, please explain:

The project managment costs appear to be low compared to similar projects (\$8,856 a year). Some project management costs may be identified in the subcontractor budgets (Task 8). Recommend requesting additional information/clarification on project management costs.

10. Does the proposal clearly state the type of expenses encompassed in indirect rates or overhead costs? Are indirect rates, if used, appropriately applied?

#### No.

If no, please explain:

No detail provided however, overhead rate is reasonable (8%).

11. Does the proposal adequately explain major expenses? Are the labor rates and other charges proposed reasonable in relation to current state rates?

No.

If no, please explain:

No equipment identified in budget detail. Recommend researching if subcontractors are purchasing equipment since the entire budget is over \$1.0 million.

12. For equipment >=\$5,000, was a separate worksheet filled out? Please note: No overhead or indirect rate charges are allowed on the equipment purchases

#### No.

13. Is the purpose for all travel clearly represented in either the proposal itself, or in the Tasks and Deliverable Form?

Please note: Recurring travel costs for a specific task or subtask may be combined into one entry on the Budget Form, but the number of trips and cost for each trip must be clearly represented.

#### Yes.

14. Are travel and per diem at <u>rates specified by the California Department of Personnel Administration</u> for similar employees?

#### Yes.

15. Are other agencies contributing or likely to contribute a share of the projects? costs?

#### Yes.

If yes, when sufficient information is available, please total the amount of matching funds likely to be provided:

Cost Share total - \$474,000 - Other Matching in-kind - \$300,000 (through grant funds and Napa RCD) Recommend more detailed regarding cost sharing of specific tasks/deliverables.

16. If the applicant identified cost share or matching funds, are they also described in the text of the proposal?

#### Yes.

17. Does the applicant take exception to the standard grant agreement's terms and conditions?

If yes, are the approaches the applicant proposes to address these issues a reasonable starting point for negotiation a grant agreement?

#### Yes.

18. Are there other budget issues or "red flags" that warrant consideration?

#### No.

19. Provide revised amount requested based upon your review:

#### Other comments:

Complete budget narrative was not provided. Recommend more detail on task and deliverables table